



United States Steel Corporation
Law Department
600 Grant Street
Pittsburgh, PA 15219-2800
Tel: 412.433.2919
Fax: 412.433.2964
E-mail: dwhacker@uss.com

David W. Hacker
Attorney

MAR 27 2009

March 26, 2009

VIA FEDERAL EXPRESS OVERNIGHT DELIVERY

Attn: Compliance Tracker, AE-17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, IL 60604

Dear U. S. EPA Region V Representative:

On or about November 18, 2008, United States Steel Corporation (U. S. Steel) received a Clean Air Act §114 Request for Information regarding its Gary Works. The response required U. S. Steel to provide certain information regarding its Gary Works operations within 30 calendar days of receipt of the Request and submit the requested emissions testing reading results within 90-days of receipt of the Request. In response to that request, on December 18th, U. S. Steel provided U. S. EPA with responsive information, noting that it would continue to search for other responsive information and would supplement its response if appropriate. In addition, in that response, U. S. Steel explained, as was previously verbally discussed with U. S. EPA, that it was unable to conduct the requested emissions testing on the No. 1 BOP Shop and No. 8 Blast Furnace because these operations were temporarily idled in light of the current economic downturn. U. S. Steel also explained that emissions testing on Blast Furnace No. 4 were on-going and the results would be submitted by February 16, 2009 in accordance with the Request. U. S. Steel responded to U. S. EPA on February 16, 2009 by providing the requested Blast Furnace No. 4 emission testing results and advised U. S. EPA that the No. 1 BOP Shop had recently resumed operations and U. S. Steel would submit the requested emission testing results by March 27th. This correspondence serves to provide those BOP Shop emission testing results and to supplement our response to the request regarding Blast Furnace No. 14 production data (Request No. 4). While we indicated that we would continue to search for additional responsive information, U. S. Steel was unable to locate any additional responsive information to the other requests.

With exception to the requested emissions testing on Blast Furnace No. 8, U. S. Steel believes it has fully responded to U. S. EPA's information requests. While responding to these Requests in good faith, U. S. Steel believes that the Requests are unduly burdensome and overly broad, especially to the time frame to which the Requests pertain. U. S. Steel specifically objects to any definition or Request that can be interpreted to impose on U. S. Steel an obligation to collect

Attn: Compliance Tracker, AE-17J

March 26, 2009

Page 2

information greater than that imposed by §114 of the Clean Air Act. Furthermore, U. S. Steel questions the relevance and probative value of these Requests, and by providing a response, U. S. Steel does not concede to the relevance or materiality of the information sought by any request or subject matter to which they refer, nor does U. S. Steel waive any such objections. Please note that the responses provided herein or attached shall not constitute any admission of liability on the part of U. S. Steel for any alleged violations.

Subject to the conditions noted above, enclosed herein, please find supplemental responses to Request Nos. 4 and 11, and confirmation that U. S. Steel was unable to locate additional responsive information to Request Nos. 1 and 3, pursuant to the EPA Request received on November 18, 2008.

1. U. S. EPA REQUEST NO. 1:

For Blast Furnace 4, provide the operability each month, which is the number of hours that the furnace was in operation relative to the number of possible hours in one month, from January 1980 through December 2007. Also provide the production (tons of hot metal) from Blast Furnace 4 each month for this time period.

U. S. STEEL RESPONSE:

In our February 16, 2009 correspondence, U. S. Steel indicated that it would continue to search for responsive information. Since then, U. S. Steel has not been able to locate any additional responsive information that was not previously furnished to U. S. EPA.

3. U. S. EPA REQUEST NO. 3:

For Blast Furnace 14 (previously Blast Furnace 13 and herein referred to as Blast Furnace 13/14), provide the operability each month, which is the number of hours that the furnace was in operation relative to the number of possible hours in one month, from January 1980 to the present. Also provide the production (tons of hot metal) of Blast Furnace 13/14 each month for this time period.

U. S. STEEL RESPONSE:

In our February 16, 2009 correspondence, U. S. Steel indicated that it would continue to search for responsive information. Since then, U. S. Steel has not been able to locate any additional responsive information that was not previously furnished to U. S. EPA.

4. U. S. EPA REQUEST NO. 4:

For Blast Furnace 13/14, provide the maximum daily production (tons hot metal) actually achieved each month from January 1980 to the present.

U. S. STEEL RESPONSE:

Please refer to the folder, labeled, "Supplemental Response to Request No. 4," in the attached disk.

Attn: Compliance Tracker, AE-17J
 March 26, 2009
 Page 3

11. U. S. EPA REQUEST NO. 11 – EMISSIONS TESTING

Emissions Testing: U.S. Steel must conduct tests to determine the opacity of particulate matter being emitted to the environment according to the schedule below. Specifically, U.S. Steel must perform the following tests pursuant to 40 CFR Part 60, Appendix A, EPA Method 9 for:

- The #1 BOP shop roof monitor for four consecutive heats, twice per week (eight heats per week) for eight consecutive weeks.

U. S. STEEL RESPONSE: *U. S. Steel has completed the requested emission testing at the #1 BOP shop roof monitor. The reading were taken Please refer to the folder, labeled, "Supplemental Response to Request No. 11 – No 1 BOP Emissions Testing," in the attached disk. The reading were taken with the requested notations on Week 1 – January 28 and January 29, 2009; Week 2 – February 2 and February 3, 2009; Week 3 – February 9 and February 10, 2009; Week 4 – February 16 and February 19; Week 5 – February 23 and February 24, 2009; Week 6 – March 2 and March 3, 2009; Week 7 – March 9 and March 10, 2009; and Week 8 – March 16 and March 18, 2009. U. S. Steel also refers U. S. EPA to the previously submitted BOP emissions testing results that were provided to U. S. EPA on or about December 7, 2007 pursuant to a Request dated November 9, 2007.*

- The Blast Furnace 8 casthouse roof monitor for a period of 4 consecutive hours (while the furnace is being tapped) twice per week for eight consecutive weeks.

U. S. STEEL RESPONSE: *Blast Furnace No. 8 was idled prior to U. S. Steel's receipt of the original Request and the furnace remains idled. At this time, in light of the current economic downturn, U. S. Steel is uncertain when the furnace will be operating at normal conditions, but it will advise U. S. EPA when the furnace resumes normal production and it will conduct the requested emissions testing accordingly.*

Attn: Compliance Tracker, AE-17J
March 26, 2009
Page 4

A certification statement regarding this correspondence and all attached information is attached. Should you have any questions regarding this response or the attachments, please contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read 'D. W. Hacker', followed by a long horizontal line extending to the right.

David W. Hacker

cc: Thomas Easterly, Commissioner
Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, IN 43204 – cover letter only

S. Argentieri, Esq. (USEPA) – cover letter only
B. Dickens, PE (USEPA) – cover letter only
R Lange – cover letter only
J. Alexander
D. Smiga – cover letter only
F. Harnack – cover letter only
T. Woodwell – cover letter only
M. Jeffrey

DWH:mmh

CERTIFICATION

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based upon my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to section 113(c)(2) of the Act, and 18 U.S.C. Sections §§ 1001 and 1341.

SLK Owen General Manager
Name and Title

3-25-09
Date